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REDACTED – FOR PUBLIC INSPECTION

January 20, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-A325
445 12th Street, SW
Washington, DC 20554

Re: *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92;
Establishing Just and Reasonable Rates for Local Exchange Carriers,
WC Docket No. 07-135; *Connect America Fund*, WC Docket No. 10-90; *High-Cost*
Universal Service Support, WC Docket No. 05-337; *A National Broadband Plan for Our*
Future, GN Docket No. 09-51

Dear Ms. Dortch:

To expedite review of the regression analysis filed by Windstream and others on June 30, 2011,¹ Windstream Communications, Inc. (“Windstream”) hereby submits three documents that, respectively, detail the specific parameters used for the regression equation, provide the computer code to implement the regression equation, and produce sample outputs of the regression equation. These three documents do not require confidential treatment.

Windstream also submits, on the enclosed CD-ROM, data on the demographics of individual wire centers within most price cap carriers’ study areas.² These demographic data may be relied upon when allocating Connect America Fund Phase I support, because the data are appropriate, reliable, and consistent across the areas addressed. Windstream requests confidential treatment of this information, pursuant to the Protective Order in CC Docket No. 01-92, WC Docket Nos. 05-337, 07-135, and 10-90 and GN Docket No. 09-51 (September 16, 2010) (*Protective Order*). Consistent with *Protective Order* instructions,

¹ Letter from Jennie B. Chandra, Windstream Communications, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 10-90, 05-337, 03-109, 07-135, GN Docket No. 09-51, CC Docket Nos. 96-45, 01-92 (June 30, 2011).

² The wire center data filed herein do not address Alaska, the Mariana Islands, Puerto Rico, and the Virgin Islands.

Windstream has placed a label on the CD-ROM stating “CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135, 10-90 AND GN DOCKET NO. 09-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.” This confidential treatment is required because the CD-ROM contains data derived from third-party data sources that are subject to licensing agreements that limit public access.

Pursuant to the *Protective Order*, Windstream is filing with the Secretary a version of this letter marked “CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN CC DOCKET NO. 01-92, WC DOCKET NOS. 05-337, 07-135, 10-90 AND GN DOCKET NO. 09-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.”

Finally, Windstream clarifies two elements of the regression analysis filing that was submitted on June 30, 2011:

- For all variables to protect against taking the LOG of 0, one (1) was added to all input values prior to taking the LOG. Subsequent to the resolution of the equation and taking the anti-LOG to arrive at the predicted Total Cost, (1) was subtracted from the value to remove the impact of adding (1) to all input values prior to taking the LOG.
- The use of the labels describing regression terms LOG_X_SQ refers to LOG X, squared. For example, LOG_BizLocs_SQ is implemented as $\text{LOG}(\text{BusinessLocations}+1)*\text{LOG}(\text{BusinessLocations}+1)$. This implementation practice is consistent for all terms similarly labeled in the filing submitted on June 30, 2011. The computer code included as an attachment to this filing further clarifies the specific manner in which the regression equation was processed.

Please contact me if you have any questions.

Sincerely,

/s/

Jennie B. Chandra

cc: Lynne Hewitt Engledow